

STATEMENT OF BASIS (AI No. 19375)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0003492 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: City of Natchitoches, Department of Utilities  
Municipal Power Plant  
Post Office Box 37  
Natchitoches, Louisiana 71457

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: March 13, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

- B. NPDES permit - (LA0003492)  
NPDES permit effective date: March 22, 1984  
NPDES permit expiration date: March 21, 1989  
EPA has not retained enforcement authority.
- C. LWDPS permit - (WP0298)  
LWDPS permit effective date: June 27, 1986  
LWDPS permit expiration date: June 26, 1991
- D. LPDES permit -  
(LA0003492)  
LPDES permit effective date: February 1, 2001  
LPDES permit expiration date: January 31, 2006  
  
(LAR05N399)  
LPDES permit effective date: June 20, 2003  
LPDES permit expiration date: April 30, 2006
- E. Date Application Received: June 13, 2005

## 2. FACILITY INFORMATION

### A. FACILITY TYPE/ACTIVITY - steam electric power plant

The permittee is an existing steam/electric generating facility. The facility consists of six dual-fired diesel units and three combustion boilers (two dual-fired and one natural gas-fired) for the production of steam and electricity. The plant is currently used as a peaking facility primarily during the summer months and has the capacity to generate 55 megawatts of electricity. The three electricity-generating boilers are operated on demand. The diesel units are used for start-up power generation in emergency situations only. This facility uses water from the municipal water supply. It is not regulated by Section 316 (b) of the Clean Water Act for cooling water intake structure as it does not have an intake structure which withdraws water from waters of the state.

### B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: IV
3. Wastewater Type: III
4. SIC code: 4911

C. LOCATION - 1100 Power Plant Drive, Natchitoches, Natchitoches Parish  
Latitude 31°46'10", Longitude 93°05'39"

## 3. OUTFALL INFORMATION

### Outfall 001

Discharge Type: stormwater runoff, cooling tower blowdown, and low volume wastewater including but not limited to boiler blowdown, air compressor cooling water, regeneration/demineralizer wastewater and floor drain water

Treatment: oil/water separator

Location: at the point of discharge from the drainage pipe located southeast of the oily water basin along the southern boundary of the property (Latitude 31°46'14", Longitude 93°05'38")

Flow: 0.11 mgd

Discharge Route: local drainage thence to Bayou Jacko

## 4. RECEIVING WATERS

STREAM - unnamed ditch thence to Bayou Jacko

BASIN AND SEGMENT - Red River Basin, Segment 101001

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
d. drinking water supply\*\*  
f. agriculture

\*\*This designated use only applies to the named waterbody and not to the tributaries and distributaries.

**5. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

**6. COMPLIANCE HISTORY/COMMENTS**

**A. Compliance History**

An inspection was conducted on May 5, 2001. The findings were as follows:  
(1) facility is an electric generating power plant run only a few days a year; (2) discharge is continual consisting of cooling water for various pieces of equipment; (3) no permit excursions were noted; (4) all evaluated factors appeared to be satisfactory at the time of the inspection

**B. DMR Review/Excursions**

All DMR's have been submitted in accordance with the existing permit. No excursions were found.

## 7. EXISTING EFFLUENT LIMITS

Outfall 001 - process area stormwater runoff, cooling tower blowdown, and low volume wastewaters consisting of but not limited to boiler blowdown, air compressor cooling water, and regeneration/demineralizer wastewater

Parameter	LPDES	
	Monthly Average	Daily Max
Flow - MGD	Report 1/week Est.	Report 1/week Est.
Temperature	88°F 1/week Grab	93°F 1/week Grab
Free Available Chlorine	0.2 mg/L 1/month Grab	0.5 mg/L 1/month Grab
Total Chromium	0.2 mg/L 1/year Grab	0.2 mg/L 1/year Grab
Total Zinc	1 mg/L 1/month Grab	1 mg/L 1/month Grab
TSS	30 mg/L 1/month Grab	100 mg/L 1/month Grab
Oil & Grease	15 mg/L 1/month Grab	20 mg/L 1/month Grab
TOC	---	50 mg/L 1/3 month Grab
pH	6 - 9 s.u. 1/month Grab	

#### **8. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 101001 of the Red River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005, from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

#### **9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

#### **10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

#### **11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

**Rationale for City of Natchitoches, Department of Utilities**

1. Outfall 001 - stormwater runoff, cooling tower blowdown, and low volume wastewater (boiler blowdown, air compressor cooling water, regeneration/demineralizer wastewater and floor drain water (estimated flow is 0.11 mgd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	Report:Report	previous permit*
Temperature	93°F:95°F	BPJ*
Free Available Chlorine	0.2:0.5	40 CFR 423.13*
Total Chromium	0.2:0.2	40 CFR 423.13*
Total Zinc	1.0:1.0	40 CFR 423.13*
TSS	30:100	40 CFR 423.12*
Oil & Grease	15:20	40 CFR 423.12*
TOC	---:50	previous permit*
pH	6.0 - 9.0	40 CFR 423.12*

**Treatment:** oil/water separator

**Monitoring Frequency:** 1/week for flow and temperature; 1/month for Free Available Chlorine, Total Zinc, TSS, oil and grease, and pH; 1/3 months for TOC and 1/year for Total Chromium at the point of discharge from the drainage pipe located southeast of the oily water basin along the southern boundary of the property

**Limits Justification:** Limits based on 40 CFR 432, the previous permit, and BPJ. The temperature is being increased to 93°F average and 95°F daily max at the request of the facility. This temperature limitation will not exceed the Louisiana Water Quality Standards for temperature in fresh water as promulgated at LAC 33:IX.1113.C.4.b.i. (Note: The facility also requested a reduction in monitoring frequencies for total zinc, oil and grease, and total organic carbon to 1/3 months. The monitoring frequency for TOC is already set at 1/3 months. The monitoring frequencies for total zinc and oil and grease will remain at 1/month to consistent with other steam electric power plants.

\* Existing permits for similar outfalls  
BPJ Best Professional Judgement  
su Standard Units

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

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STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

Stormwater discharges are covered under the Multi-Sector General Permit, LAR05N399, issued on June 20, 2003.

303(d)/TMDL WATERBODIES

Subsegment 101001 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDL's.